

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AMERICAN HOME MORTGAGE SECURITIES LITIGATION)	07-MD-1898 (TCP)
)	
)	
THIS DOCUMENT RELATES TO)	Electronically filed
ALL CLASS ACTIONS)	
)	

**NOTICE OF LEAD PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF
SETTLEMENTS, CERTIFICATION OF THE CLASS FOR SETTLEMENT PURPOSES
AND APPROVAL OF NOTICE TO THE CLASS**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Lead Plaintiffs, the Teachers' Retirement System of Oklahoma and the Oklahoma Police Pension and Retirement System, upon (i) the Stipulation and Agreement of Settlement dated April 8, 2009 setting forth the terms of the proposed settlement with defendants Michael Strauss, Stephen A. Hozie, Robert Bernstein, John A. Johnston, Michael A. McManus, Jr., C. Cathleen Raffaeli, Nicholas R. Marfino, Kenneth P. Slosser, Irving J. Thau, and Kristian R. Salovaara (the "Individual Defendants Settlement"), attached hereto as Exhibit 1; (ii) the Stipulation and Agreement of Settlement dated July 1, 2009 setting forth the terms of the proposed settlement with defendant Deloitte & Touche LLP (the "Deloitte Settlement"), attached hereto as Exhibit 2; and (iii) the Stipulation and Agreement of Settlement dated July 1, 2009 setting forth the terms of the proposed settlement with defendants Citigroup Global Markets Inc., Citigroup Inc., J.P. Morgan Chase & Co., Deutsche Bank Securities Inc., Deutsche Bank A.G., Stifel, Nicolaus & Company, Incorporated, and Ryan Beck & Co., Inc. (the "Underwriter Defendants Settlement"), attached hereto as Exhibit 3; and upon the Memorandum of Law in Support of Lead Plaintiffs' Motion for Preliminary Approval of Settlements,

Certification of the Class for Settlement Purposes and Approval of Notice to the Class, through their undersigned counsel, hereby move this Court for entry of an Order that will, among other things: (i) preliminarily approve the Individual Defendants Settlement, the Deloitte Settlement and the Underwriter Defendants Settlement; (ii) certify the Class and the Offerings Subclass, for settlement purposes only, pursuant to Rules 23(a) and (b)(3) of the Federal Rules of Civil Procedure; (iii) approve the proposed forms of mailed and publication notice, which will provide Class Members (including Offerings Subclass Members) with information concerning the proposed Settlements; and (iv) designate Analytics, Incorporated as Claims Administrator.

For the reasons set forth in Lead Plaintiffs' Memorandum of Law and in the Stipulations, Lead Plaintiffs respectfully request that the Court find that the proposed Settlements merit preliminary approval. A proposed Order granting the relief requested herein is attached hereto as Exhibit 4.

Dated: July 7, 2009

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ Steven B. Singer

Steven B. Singer (SS-5212)

Avi Josefson

1285 Avenue of the Americas, 38th Floor
New York, New York 10019

Telephone: 212-554-1400

Facsimile: 212-554-1444

BERMAN DEVALERIO

Jeffrey C. Block (JCB-0387)

Kathleen M. Donovan-Maher

Kristin Moody

One Liberty Square

Boston, MA 02109

Telephone: (617) 542-8300

Facsimile: (617) 542-1194

*Attorneys for Lead Plaintiffs and
Co-Lead Counsel for the Class*

MURRAY, FRANK & SAILER LLP

Marvin L. Frank (MF-1436)
275 Madison Avenue, 8th Floor
New York, New York 10016
Telephone: (212) 682-1818
Facsimile: (212) 682-1892

SUSMAN HEFFNER & HURST LLP

Arthur T. Susman
Matthew T. Heffner
Matthew T. Hurst
Two First National Plaza, Suite 600
Chicago, Illinois 60603
Telephone: (312) 346-3466
Facsimile: (312) 346-2829

*Attorneys for Plaintiffs Marlin, Karol and
Mika*

#386231.1